

1 BROWN AND SEELYE PLLC
2 Ellen Ann Brown Esq.
3 Susan H. Seelye Esq.
4 744 South Fawcett Ave
5 Tacoma, WA 98402
6 Telephone 253-573-1958
7 Facsimile 253-274-1200

HONORABLE MARY JO HESTON
HEARING DATE: January 23, 2020
TIME: 1:00 pm
RESPONSE DATE: January 16, 2020
Chapter 13

4 **IN THE UNITED STATES BANKRUPTCY COURT FOR THE
5 WESTERN DISTRICT COURT OF WASHINGTON**

6 **Re**

7 **TRAVIS LIBERTY MCGEE
8 MARILYN CHRISTINE MCGEE**

9 **Debtor(s)**

**In Chapter 13 Proceeding
No. 17-44141-MJH**

RESPONSE TO MOTION TO DISMISS

10 COMES NOW the above-referenced debtor(s) through their attorneys of record and responds to
11 the Motion to Dismiss by the Trustee as follows:

12 . 1. Debtor has been out of work due to an injury and has been unable to make his plan
13 payment.
14 2. Debtor will return to the doctor on 1/8/20 and will hopefully be cleared to return to work on
15 that date.
16 3. Debtors request that this matter be continued to the 2/20/20 calendar in order to give the
17 Debtor an opportunity to be back at work and modify the Plan to cure the arrears.

18 Dated January 6, 2020

19
20 /s/ Ellen Ann Brown

21

22 ELLEN ANN BROWN WSB#27992
23 Attorneys for Debtor(s)

24
25 **RESPONSE**

Page 1

BROWN and SEELYE PLLC
744 South Fawcett Ave.
Tacoma, WA 98402
253-573-1958